

VOIR DIRE

1. The plaintiff in this case is Robert Earl Foster, who resides at Leavenworth Detention Center. Does anyone know plaintiff Robert Earl Foster?
2. Plaintiff is represented by attorney Brent Dwerlkotte of the firm Shook, Hardy & Bacon, LLP. Mr. Dwerlkotte has his office in Kansas City. Do any of you know Mr. Dwerlkotte or the firm of Shook, Hardy & Bacon, LLP?
3. Have any of you ever been represented by Mr. Dwerlkotte or anyone at Shook, Hardy & Bacon, LLP?
4. The defendant in this case is Columbia Police Officer Dan Wright. Do any of you know Officer Dan Wright?
5. The defendant is a police officer for the City of Columbia, Missouri. Have any of you or any close family members ever lived in the City of Columbia or been employed by the City of Columbia?
6. The defendants are represented by Robert J. Krehbiel of the law firm King, Krehbiel & Hellmich, LLC. Mr. Krehbiel's firm has its offices in St. Louis. Does anyone know attorney Robert J. Krehbiel or anyone with his firm?
7. Does anyone know anything about the facts of this case?
8. During the trial there will be several persons called as witnesses in addition to the plaintiff and the defendant. Does anyone know any of the following persons who may be called as witnesses during the trial of this case?
 - a. Harlan Hatton
 - b. John Dye
 - c. Robert Dochler
 - d. Michael Perkins
9. We anticipate that this case will be submitted to you by Thursday or Friday of this week. Does anyone have an extreme hardship serving on the jury for that amount of time?
10. Does anyone have any type of problem with hearing, seeing, or sitting for periods of time? Without going into details, does anyone have any medical, family, or work related problems with serving on this jury?
11. Has anyone served on a jury before?

- a. Was your jury service in a civil or a criminal case?
 - b. Was your jury service in state or federal court?
 - c. Without divulging what the verdict was, was a verdict reached in the case in which you served as a juror?
 - d. Were you the foreperson of the jury?
 - e. Was there anything about your experience with serving on that jury that would cause you a problem with serving on this jury if you are selected?
12. Does anyone have any training in the law? I do not mean to limit this question to persons who have actually attended law school. I am inquiring about any training you may have had in the law such as a business law course, a course in constitutional law, or any similar type of course.
13. The defendant is a law enforcement officer. Does anyone have a problem giving the defendants a fair trial because he is a law enforcement officer?
14. Has anyone on the panel or any member of your family ever had a problem with a police officer?
- a. Were there any situations in which you feel that you or your family member was not treated fairly by a police officer?
 - b. If so, would that fact cause you any problem with serving on this jury and being fair and impartial to all of the parties?
 - c. Due to the nature of this case, it is necessary for me to ask whether anyone or any member of your family has ever been arrested and taken into custody by a police officer or other law enforcement officer?
 - d. If so, would that fact cause you any problem with serving on this jury and being fair and impartial to all of the parties?
 - e. Has anyone or any member of your family ever filed any type of a complaint against a police officer or law enforcement officer?
 - f. If so, what for?
15. Has anyone or any member of your family ever worked in the area of law enforcement?
- a. If so, what did you or your family member do?

- b. Would that fact cause you any problem with serving on this jury and being fair and impartial to all of the parties?
- 16. Are any of you or any member of your family related to a police officer or other type of law enforcement officer?
 - a. If so, would that fact cause you any problem with serving on this jury and being fair and impartial to all of the parties?
- 17. Has anyone or any close member of your family ever been involved in a civil case as either a plaintiff or a defendant?
 - a. If so, is there anything about that fact that would cause you a problem with serving on this jury and being fair and impartial to all of the parties?
- 18. Has anyone ever made a claim against anyone else or had a claim made against you, even if no lawsuit was filed?
 - a. If so, is there anything about that experience that would cause you a problem with serving on this jury and being fair and impartial to all of the parties?
- 19. Does anyone feel that just because a claim has been made against someone, that that claim must be true?
- 20. Is anyone related to an attorney?
- 21. Does anyone now work or have you worked in the past for an attorney or law firm?
- 22. Do any of you know anyone else on this jury panel?
- 23. Is there anything that any of you can think of that we have not asked you about already that you feel may present a problem with your ability to serve on the jury and be fair and impartial to all of the parties?